

IN THE UNITED STATES OF  
DISTRICT COURTS FOR THE STATE OF DELAWARE

CURTIS M. COLLINS  
PLAINTIFF,

v.

BEREZANSKY  
WARDEN RICK KEARNEY  
S.G.T. CHANLLER" ET. AL

CIV. ACT. NO.  
05-739-SLR

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 AUG 31 PM 3:08  
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MOTION TO PRODUCE MEDICAL  
RECORD REPORTS OF PLAINTIFF

1. PLAINTIFF CURTIS M COLLINS  
REQUESTS FIRST CORRECTIONAL  
SERVICES OF SUSSEX CORRECTION  
DR. ROBERTA BURNS' HEAD OF THE  
MEDICAL DEPT TO PRODUCE  
MEDICAL RECORDS REPORTS OF  
PLAINTIFF COLLINS FROM THE  
DATE OF AUGUST 6, 2005 UP UNTIL  
NOW THE PRESENT DATE. THAT  
PLAINTIFF HAS BEEN ALLOWED  
TO PROCEED IN THE ABOVE CIVIL  
ACTION BEFORE THE COURTS THAT  
PLAINTIFF COLLINS HAS SUFFERED  
SERIOUS LIFE THREATENING INJURIES  
DUE TO THE GANGING UP AND BEATING  
UP ON PLAINTIFF BY CORRECTIONAL  
OFFICERS BEREZANSKY, S.G.T.  
CHANLLER, ET. AL

IN THE UNITED STATES.<sup>2</sup>  
DISTRICT COURT'S FOR THE  
"STATES OF DELAWARE"

PLAINTIFF IS ENTITLED TO  
HAVE COPIES OF HIS MEDICAL  
RECORDS REPORTS TO SHOW  
SUPPORT OF THESE LIFE  
THREATENING INJURIES.  
THAT PLAINTIFF WAS TRANSFERRED  
FROM SUSSEX CORR. INST. S.C.I.  
TO DEL. CORR. CENTER (D.C.C.)  
THEREFORE, PLAINTIFF REQUESTS  
THE COURT'S TO ORDER PRODUCTION  
OF PLAINTIFF COLLINS MEDICAL  
REPORTS OF FIRST CORR. MEDICAL  
SERVICES. C.M.S. OF D.C.C.  
THAT PLAINTIFF IS STILL BEING  
TREATED FOR THE SERIOUS MED-  
ICAL INJURIES SUSTAINED IN  
THE NEAR DEATH BEATINGS  
OF SUSSEX CORR. CENTER  
CORRECTIONAL OFFICERS  
PLAINTIFF HAS NAMED IN THIS  
INSTANT CIVIL ACTION  
WHERE AS PLAINTIFF PRAYS  
FOR RELIEF AND FOR THIS  
HONORABLE COURT TO GRANT  
PLAINTIFF MOTION TO PRODUCE  
MEDICAL RECORDS REPORTS

PAGE #3  
OF PLAINTIFF  
COLLINS' MOTION  
TO PRODUCE MEDICAL  
RECORDS' REPORTS ~~XXXXXX~~

Curtis Collins

CURTIS COLLINS

S.B.I.# #314128

D.C.C.

B.L.D.g# #21

TIER C-U-3#

1181 PADDOCK RD Smyrna  
DEL, 19977

DATE: 8-27-06

CERTIFICATE OF  
SERVICE

4

I, CURTIS M COLLINS  
hereby CERTIFY THAT ON  
THIS 8 DAY OF 29-06  
I HAVE HONORED THIS MOTION  
TO PRODUCE MEDICAL RECORDS  
TO A DELAWARE CORR CENTER  
PRISON GUARDS TO PLACE  
SAID MOTION IN D.C.C.  
UNITED STATE'S MAIL SYSTEM  
IN A PRE-PAID ENVELOPE TO  
BE SENT TO THE DEL DISTRICT  
COURTS AND:

SEC. DR. ROBERTA BURNS

ERRICA Y. TROSS ESQ. P.O. Box 500 GEORGETOWN  
(ID # 4506) DEL 19947

DEPUTY ATTORNEY GENERAL

D.EPT OF JUSTICE

CARVEL STATE OFFICE Building

820 N FRENCH STREET

6TH FLOOR

WILMINGTON, DEL 19801

ph# 302-577-8400

By Curtis Collins

S.B.I 314128#

D.C.C. B.I.D. 9 21#

TIER C-U-3#

FIRST CORR MEDICAL SERVICES 181 PADDOCK RD.

1575 MCKEE RD.  
DOVER DEL 19904

SMYRNA, DEL 19977